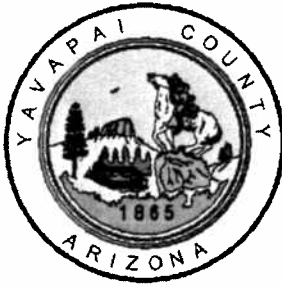


# BOARD OF SUPERVISORS DISTRICT 3



**A.G. "CHIP" DAVIS**  
**Supervisor, District 3**

10 S. Sixth Street  
Cottonwood, AZ 86326  
(928) 639-8110  
chip.davis@co.yavapai.az.us

July 2, 2008

Mr. Doug Dunham, Deputy Assistant Director  
Arizona Department of Water Resources  
Water Management Division  
3550 N. Central Avenue  
Phoenix, AZ 85012

Re: SB 1575, Groundwater Transportation Rulemaking, Big Chino Sub-Basin

Dear Mr. Dunham:

Thank you for the opportunity to comment on the Groundwater Transportation rulemaking process that the Arizona Department of Water Resources is currently undertaking in the Big Chino sub-basin of the Verde River Basin. This process is important to all of Yavapai County and we would like to insure that rules are not declared into use that could negatively impact our communities or affect the historic base flow of the Verde River.

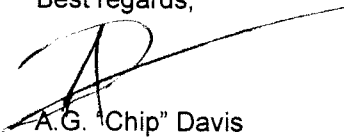
We were copied on the letter that the Town of Clarkdale sent to you and agree with the points made in that letter (enclosed). We would like to add a few other points that we think are important for consideration and discussion.

- Hauled water source not regulated: Could we require identifying and quantifying source and also require 100 year assured supply?
- We agree passing SB 1575 would require developers to provide adequate hydrologic information rather than the easy out right now of getting inadequate supply designation and moving forward. Why aren't we as a state demanding information and research to aid in our decision making process?
- With the exception of the initial adoption of SB 1575, are any options, adoptions or exemptions subject to unanimous vote by the Board of Supervisors?
- How do we manage exempt wells/lot splits if the County adopts SB 1575; surely we can design some type of regulation to accomplish total management of our water resources.
- How will we address management of our resource when aquifers cross political boundaries? For example, one county adopts and the adjacent county does not adopt.
- Can we assign surface water as designated use in order to protect our rivers and streams? Can we designate our natural surface waters as senior rights holders?
- If we really want to slow wildcat subdivisions and lot splits, why don't we require the same criteria as the subdivision approval process?

We would assume that effective management of Arizona's resource is the goal of all. It is difficult to adopt piecemeal legislation that will not solve the goal. What can we do together to solve Arizona's water problems?

Thank you for your attention and please address the above questions and concerns as we move through the rulemaking process.

Best regards,



A.G. "Chip" Davis  
Supervisor District 3

Cc: Director Herb Guenther, Department of Water Resources  
Senator Tom O'Halleran, District 1  
Representative Lucy Mason, District 1  
Representative Andy Tobin, District 1  
Mayor Diane Joens, City of Cottonwood  
Mayor Tony Gioia, Town of Camp Verde  
Mayor Rob Adams, City of Sedona  
Mayor Jack Wilson, City of Prescott  
Mayor Harvey Skoog, Town of Prescott Valley  
Mayor Karen Fann, Town of Chino Valley  
Mayor Al Palmieri, Town of Jerome  
Supervisor Tom Thurman, Yavapai County District 2  
Supervisor Carol Springer, Yavapai County District 3  
Greg Kornrumpf, Salt River Project  
John Rasmussen, Yavapai County Water Advisory Committee